Master File No. 09-MD-2027 (BSJ)

(Consolidated Action)

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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

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SATYAM COMPUTER SERVICES, LTD.

SECURITIES LITIGATION (This Document Applies To All Cases)

IN RE:

## SECOND DECLARATION OF STUART MACK, ESQ.

I, STUART A. MACK, ESQ., declare as follows:

- 1. I am an attorney admitted to practice before this Honorable Court.
- 2. My firm represents the Defendant, Maytas Infra Limited (hereinafter "MIL") in the action with Case No. 09-md-2027 (the "Satyam Action") and the action with Case No. 10-cv-02877 (the "Aberdeen Action").
- 3. I submit this Declaration in further support of MIL's motions to dismiss both the Satyam Action and the Aberdeen Action for: (1) lack of *in personam* jurisdiction pursuant to FRCP 12(b)2 and FRCP 12(b)(5); (2) *forum non conveniens*; and (3) failure to state a cause of action pursuant to F.R.C.P. Rules 8, 9, and 12(b)(6), the Private Securities Litigation Reform Act, Title 15 USC § 78u-44(b)(2) (the "PSLRA"), and the Securities Litigation Uniform Standards Act, 15 U.S.C. § 78bb(f)(1) (the "SLUSA").

4. I attach hereto as Exhibit "A", a true and correct copy of a news article retrieved from http://news.in.msn.com/national/article.aspx?cp-documentid=3838789,

entitled "Satyam Raju's Trial A Bigger Story Than the Scam", dated April 19, 2010.

5. I attach hereto as Exhibit "B", a true and correct copy of the certificate of

service filed on December 17, 2009, regarding service upon MP in accordance with the

Hague Convention.

6. I attach hereto as Exhibit "C", true and correct copies of the previously

submitted Declarations of Aziz Mushabber Ahmadi.

7. I declare under penalty of perjury under the laws of the United States of

America that the foregoing is true and correct.

Dated: New York, New York July 7, 2011

## LAW OFFICES OF STUART A. MACK

By: /s/
Stuart A. Mack (SM 3231)

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